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September 14, 2012

Via ECF

Honorable Leonard D. Wexler
United States District Court for the Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: Charlot et al. v. Ecolab, Inc., No. 12-cv-04543 (LDW)(GRB)

Dear Judge Wexler:

We represent Plaintiffs in the above-referenced matter. We write to attempt to correct a mistake Plaintiffs made on the Civil Cover Sheet.

Plaintiffs filed their Class Action Complaint in the Eastern District of New York, Brooklyn. Pursuant to Local Rules 50.1(d)(3) and 50.2(f), we write to respectfully request that designation of the case as a Long Island case be canceled and that the case be reassigned to Brooklyn.

A substantial part of the events or omissions giving rise to the Plaintiffs' claims occurred in Queens County and not in Nassau or Suffolk Counties. Plaintiffs incorrectly answered "yes" to question 2(a) of the Local Rule 50.1(d) questions on page two of the Civil Cover Sheet, indicating in error that the relevant events or omissions occurred in Nassau or Suffolk County, and causing the case to be sent to Long Island. Moreover, the Complaint pleads New York and New Jersey class actions against a Minnesota defendant and the Brooklyn courthouse is more easily accessible to parties and witnesses traveling from New Jersey, Minnesota, and other parts of New York State. Accordingly, reassigning the case to Brooklyn would serve the convenience of all parties.

For the foregoing reasons, Plaintiffs respectfully request that the Long Island designation be canceled and the case be reassigned to Brooklyn.

Honorable Leonard D. Wexler

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We appreciate the Court's attention to this matter.

Respectfully submitted,



Molly A. Brooks

cc: Michael J.D. Sweeney
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Justin M. Swartz